

**REMARKS**

Claims 1-27 are pending in the application. By this Amendment, claims 1, 10, 12, and 16 are amended and new claims 25-27 are added.

Applicant gratefully acknowledges the Office Action's indication that claims 6-9, 12-14 and 21-24 contain allowable subject matter.

The Office Action rejects claims 1-5, 10, 11 and 15-20 under 35 U.S.C. §102(e) over U.S. Patent 6,401,200 to Nishiike et al. (hereafter Nishiike). The rejection is respectfully traversed.

The Office Action appears to reject the claims under 35 U.S.C. §112 because of the term "information processing code" (IPC) used in claims 1 and 16. Applicant respectfully submits that the present specification clearly describes an information processing code (IPC) format at least at page 2, lines 13-17 and in Figure 2. Figure 2 shows a message IPC format used when downloading data from an upper processor onto lower processors according to the related art and preferred embodiments of the present invention. At no point has applicant identified "IPC" as an interprocessor communication. Therefore, while the Office Action may state that one meaning of IPC is "interprocessor communication," the specification clearly describes an "information processing code" in definite terms. Since applicant may be his own lexicographer and the specification adequately describes the information processing code, the rejection under 35 U.S.C. §112 should be withdrawn.

Applicant maintains the arguments set forth in the October 13, 2004 response. However, the Office Action now states that Nishiike's Figure 4 shows a single source loading

simultaneously the address presented to the DSPs. The Office Action asserts that this is consistent with the group representative address claimed by the applicant. However, applicant respectfully disagrees as to this characterization as well as to the specific alleged claim language.

More specifically, previous independent claim 1 recited grouping the lower processors with a representative address and transferring the IPC format information by using the group representative address. Previous independent claim 16 recited grouping a plurality of second processors using a representative address of the plurality of second processors and transferring the requested information in the IPC format based on the representative address of the plurality of the second processors. The Office Actions comments at the top of page 3 appear to relate to an address within a master ROM 230. This clearly is not a representative address of a plurality of second processors as specifically recited in independent claim 16. Furthermore, this is not a group representative address of the lower processors as recited in independent claim 1 (and similarly recited in independent claim 10). Thus, the Office Action's comments at the top of page 3 do not correspond to the specifically claimed features.

Independent claim 1 now recites grouping the lower processors with a representative address, creating the accessed information in an information processing code (IPC) format, and transferring the IPC format information from the upper processor to the lower processor by using the group representative address, the transferred IPC format information including the accessed information and the group representative address.

Nishiike does not teach or suggest these features. That is, claim 1 clearly relates to a group representative address and transferring the IPC format information from the upper processor to the lower processor by using the group representative address and where the transferred IPC format information includes accessed information and the group representative address. The alleged address within the master ROM 230 is not transferred to the corresponding DSPs. Accordingly, Nishiike does not teach or suggest the features as alleged in the Office Action.

Each of the independent claims 10 and 16 defines patentable subject matter at least for this reason. That is, independent claim 10 recites accessing a memory once of the first processor for the requested information, grouping the second processors using a prescribed processor address, assembling the accessed information in a prescribed format, and transferring the assembled requested information from the first processor to at least two second processors using a group representative address, the transferred assembled requested information including the accessed information and the group representative address. For at least similar reasons as set forth above, Nishiike does not teach or suggest these features.

Furthermore, independent claim 16 recites grouping a plurality of second processors using a representative address of the plurality of second processors, providing the requested information in an information processing code (IPC) format, and transferring the requested information in the IPC format from the first processor to the plurality of second processors based on the representative address of the plurality of second processors, the transferred

information in the IPC format including the requested information and the representative address of the plurality of second processors. For at least similar reasons as set forth above, Nishiike does not teach or suggest these features.

For at least the reasons set forth above, each of independent claims 1, 10, and 16 defines patentable subject matter. Each of the dependent claims depends from one of the independent claims and therefore defines patentable subject matter at least for this reason. In addition, the dependent claims also recite features that further and independently distinguish over the applied references. For example, dependent claim 25 recites that the group representative address comprises an address of at least two of the lower processors. Nishiike clearly does not teach or suggest these features as Nishiike does not include an address of at least two of the processors. Rather, Nishiike only references a similar area within a master ROM 230. Accordingly, dependent claim 25 (and similarly dependent claims 26-27) defines patentable subject matter at least for this additional reason.

### CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-27 are earnestly solicited. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, David C. Oren, at the telephone number listed below.

Serial No. 09/736,432  
Reply to Office Action dated April 8, 2005

Docket No. HI-0023

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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